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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF HAWAII  
1132 Bishop Street, Suite 250  
Honolulu, Hawaii 96813

hib\_2004-1 (10/10)

Debtor: PHILLIP SCOTT HASHA

Case No.: **24-00412**

Joint Debtor:  
(if any)

Chapter: **7**

### MOTION FOR RULE 2004 EXAMINATION

Moving Party: 814 ILANIWAI LLC and SYSCO HAWAII INC.

Examinee: PHILLIP SCOTT HASHA

Examination  
Date and Time: July 8, 2024

Examination  
Location: Damon Key Leong Kupchak Hastert  
1003 Bishop St Ste 1600, Honolulu, Hawaii 96813

Type of  
Examination: ☐ Attendance at deposition ☒ Production of Documents  
[Additional details may be described in attachment – generally not necessary]

The undersigned hereby moves under Fed. R. Bankr. P. 2004(a) for an order authorizing the examination of the above-named entity and issuance of a subpoena in accordance with Fed. R. Bankr. P. 9016 to compel attendance or production of documents at the date, time, and location described above.

In support of the motion, the undersigned declares that, prior to filing this motion, the moving party has made all reasonable efforts to arrange a mutually convenient date, time, and place of examination and:

- ☒ The proposed date, time, and place of examination have been agreed upon by all concerned.
- ☐ The parties did not agree to a date, time, and place of examination after all reasonable efforts were made, but the date of the examination stated above is no earlier than 14 days after the filing of the motion for an examination order, and no earlier than 30 days after the date of issuance of the examination order or subpoena, whichever is later, if the motion includes a request for production of documents or electronically stored information.

The undersigned declares that the requested examination does not involve pending litigation in which discovery is available under Fed. R. Bankr. P. 7026, Fed. R. Civ. P. 26, or other authority.

Dated: 05/20/2024

/s/ Ross Uehara-Tilton

Movant

Print name if original signature

*This motion may be granted upon compliance with LBR 2004-1. An examinee objecting to the examination may file a motion for a protective order or, if a subpoena has been served, a motion to quash the subpoena.*

**LIST OF DOCUMENTS AND THINGS REQUESTED**  
**(PHILLIP SCOTT HASHA and WORKPLAY LLC)**

1. Articles of Organization, Operating Agreements, Company Minutes, Resolutions, and Consents for Workplay LLC, War Eagle LLC, The Redmont Group LLC, Hasha Group LLC, and Workplay Records LLC, including any and all amendments and restatements.
2. Articles of Incorporation, Bylaws, Stock Ledgers, and Corporate Minutes, Resolutions, and Consents for Paper Play, Inc. and Restoration Services Hawaii, Inc.
3. The Company's federal and state income tax returns for 2019, 2020, 2021, 2022, and 2023 (if filed).
4. The Company's Hawaii General Excise Tax annual reconciliation returns (Form G-49) for 2019, 2020, 2021, 2022, and 2023.
5. The Company's Quickbooks file (.qbw, .qbb, .qbx, or .qba format).
6. Account statements or other documents reflecting income received from or processed through any credit card or merchant service company, including the following: Citizens, Intuit, Remitly, Square, Stripe, Toast, Venmo, and WePay.
7. Account statements for any investment account maintained with Robinhood for 2019, 2020, 2021, 2022, and 2023.
8. Account statements for any credit card accounts for 2019, 2020, 2021, 2022, and 2023, including without limitation credit cards issued by American Express, Bank of America, Capital One, and Discover.
9. The Company's federal employment tax withholding returns (IRS Form 940 and/or Form 941) for 2019, 2020, 2021, 2022, and 2023.
10. W-2 Forms issued for all of the Company's employees for 2019, 2020, 2021, 2022, and 2023.
11. All loan applications made by the Company to American Savings Bank related to any loan issued by American Savings Bank, the proceeds of which were used in whole or in part to fund construction of the improvements to the Company's former premises located at 814 Ilaniwai Street, Honolulu, Hawaii ("American Savings Bank Loan"), including any supporting documentation submitted in connection with such applications.
12. All loan account statements for the American Savings Bank Loan.
13. All applications submitted by the Company for the federal Payroll Protection Program (PPP), including any supporting documentation submitted in connection with such applications. This includes without limitation the PPP loans in the amount of \$214,100 approved as of April 3, 2020, \$213,980 approved as of February 8, 2021.

14. All communications with any issuing financial institution concerning any application for a PPP loan.
15. All applications submitted by the Company for forgiveness of any PPP loan, including any supporting documentation submitted in connection with such applications.
16. All communications with any issuing financial institution concerning any applications submitted for forgiveness of any PPP loan.
17. All applications submitted by The Redmont Group LLC for any PPP loan (“Redmont PPP Loan”), including any supporting documentation submitted in connection with such applications. This includes without limitation the PPP loan in the amount of \$386,860 approved as of February 18, 2021.
18. All communications with any issuing financial institution concerning the application for the Redmont PPP Loan.
19. All applications submitted by The Redmont Group LLC for forgiveness of the Redmont PPP Loan, including any supporting documentation submitted in connection with such applications.
20. All communications with any issuing financial institution concerning any applications submitted by The Redmont Group LLC for forgiveness of the Redmont PPP Loan.
21. All account statements for any of the Company’s deposit accounts reflecting deposit of any PPP loan proceeds.
22. All applications submitted by the Company for the federal Economic Injury Disaster Loan (EIDL) program, including any supporting documentation submitted in connection with such applications.
23. All communications with the U.S. Small Business Association concerning any application for the EIDL program.
24. All account statements for any of the Company’s deposit accounts reflecting deposit of any EIDL proceeds.
25. All applications submitted by the Company for loans and/or merchant cash advances during 2020, 2021, 2022, and 2023, including without limitation cash advances described as follows: Ace Funding (\$73,600 on 12/09/2021), BMT Capital Group (amount and date unknown), Brownstone Funding (\$63,000.00 on 08/03/2021, \$162,750.00 on 11/09/2021, and other advances prior to these dates), Cayan Holdings (amount and date unknown), Channel Partners Capital (amount and date unknown), Custom Capital (amount and date unknown), Delta Bridge Funding (amount and date unknown), Fundamental Capital (amount and date unknown), Hamilton Advance (amount and date unknown), JB&B Capital (amount and date unknown), Payoneer Inc. (amount and date unknown), Pinnacle Business Funding LLC (\$144,000.00 on 12/03/2021), and WebBank/Toast (\$50,000.00 on

05/17/2021, \$65,000.00 on 07/14/2021, \$132,520.87 on 02/02/2022, \$158,365.34 on 10/20/2022).

26. Communications with Jonathan Pears, Michael Warren, Robert Sjoulander, Paul Gilman, and/or Tate Heilpern regarding the Company's business operations, loans or advances made to the Company, and/or investments in the Company.
27. Documents evidencing use of funds received from cash withdrawals or transfers from Workplay LLC's American Savings Bank account no. x7419:

<b>Date</b>	<b>Amount</b>
1/4/2021	\$8,000.00
1/5/2021	\$3,000.00
1/7/2021	\$26,917.93
1/8/2021	\$5,500.00
1/11/2021	\$8,500.00
1/14/2021	\$3,000.00
1/15/2021	\$2,500.00
1/19/2021	\$9,500.00
1/21/2021	\$3,610.00
1/25/2021	\$9,000.00
1/28/2021	\$8,000.00
2/1/2021	\$9,400.00
2/8/2021	\$4,600.00
2/9/2021	\$10,000.00
2/10/2021	\$50,000.00
2/11/2021	\$6,100.00
2/16/2021	\$11,000.00
2/17/2021	\$30,000.00
2/18/2021	\$29,774.06
2/19/2021	\$5,000.00
2/22/2021	\$5,000.00
2/22/2021	\$6,095.00
2/26/2021	\$3,850.00
3/1/2021	\$4,600.00
3/4/2021	\$5,410.00
3/8/2021	\$9,050.00
3/15/2021	\$9,570.00
3/16/2021	\$25,000.00
3/18/2021	\$12,000.00

3/24/2021	\$10,100.00
3/29/2021	\$25,000.00
3/30/2021	\$15,000.00
3/30/2021	\$7,500.00
4/2/2021	\$3,800.00
4/5/2021	\$10,900.00
4/12/2021	\$10,000.00
4/13/2021	\$10,000.00
4/14/2021	\$12,000.00
4/14/2021	\$12,000.00
4/16/2021	\$5,400.00
4/19/2021	\$3,000.00
4/19/2021	\$11,000.00
4/23/2021	\$5,800.00
4/26/2021	\$3,200.00
4/27/2021	\$15,000.00
4/28/2021	\$20,000.00
5/3/2021	\$14,200.00
5/7/2021	\$4,000.00
5/10/2021	\$20,000.00
5/10/2021	\$4,300.00
5/17/2021	\$5,000.00
5/17/2021	\$32,000.00
5/17/2021	\$5,000.00
5/17/2021	\$7,000.00
5/21/2021	\$15,000.00
5/24/2021	\$3,600.00
5/24/2021	\$6,550.00
5/26/2021	\$7,500.00
6/1/2021	\$2,500.00
6/1/2021	\$5,000.00
6/4/2021	\$4,500.00
6/4/2021	\$9,500.00
6/4/2021	\$7,000.00
6/9/2021	\$5,500.00
6/16/2021	\$4,500.00
6/18/2021	\$7,700.00
6/23/2021	\$24,000.00
6/24/2021	\$7,600.00

6/24/2021	\$37,522.46
6/28/2021	\$7,000.00
6/28/2021	\$18,000.00
6/28/2021	\$8,600.00
7/2/2021	\$7,400.00
7/6/2021	\$5,000.00
7/6/2021	\$41,203.68
7/8/2021	\$4,000.00
7/14/2021	\$49,400.00
7/19/2021	\$15,000.00
7/20/2021	\$12,000.00
7/22/2021	\$3,000.00
7/23/2021	\$9,000.00
7/26/2021	\$31,000.00
7/29/2021	\$7,500.00
7/29/2021	\$3,500.00
7/29/2021	\$5,000.00
7/30/2021	\$9,000.00
8/2/2021	\$9,200.00
8/3/2021	\$5,000.00
8/5/2021	\$4,200.00
8/5/2021	\$47,644.47
8/9/2021	\$5,000.00
8/9/2021	\$5,500.00
8/9/2021	\$9,000.00
8/13/2021	\$6,000.00
8/17/2021	\$5,000.00
8/19/2021	\$33,587.79
8/19/2021	\$7,170.00
8/20/2021	\$5,000.00
8/23/2021	\$5,000.00
8/23/2021	\$4,960.00
8/23/2021	\$15,075.74
8/25/2021	\$8,700.00
8/26/2021	\$5,000.00
8/27/2021	\$7,200.00
8/30/2021	\$5,000.00
8/30/2021	\$6,000.00
8/30/2021	\$3,500.00

8/30/2021	\$5,000.00
8/31/2021	\$50,000.00
9/2/2021	\$5,000.00
9/2/2021	\$12,100.00
9/3/2021	\$3,000.00
9/3/2021	\$44,211.81
9/7/2021	\$8,600.00
9/7/2021	\$100,000.00
9/7/2021	\$7,500.00
9/9/2021	\$7,000.00
9/14/2021	\$30,000.00
9/17/2021	\$50,000.00
9/17/2021	\$9,000.00
9/17/2021	\$37,612.82
9/17/2021	\$20,000.00
9/20/2021	\$10,000.00
9/20/2021	\$9,450.00
9/30/2021	\$35,662.34
9/30/2021	\$5,950.00
10/4/2021	\$10,000.00
10/5/2021	\$10,000.00
10/5/2021	\$7,000.00
10/12/2021	\$6,755.00
10/14/2021	\$20,000.00
10/14/2021	\$37,121.99
10/18/2021	\$7,500.00
10/18/2021	\$6,500.00
10/18/2021	\$7,500.00
10/26/2021	\$9,000.00
10/28/2021	\$37,543.47
11/1/2021	\$6,000.00
11/4/2021	\$2,000.00
11/8/2021	\$8,850.00
11/9/2021	\$50,000.00
11/12/2021	\$6,000.00
11/12/2021	\$43,559.22
11/15/2021	\$9,600.00
11/18/2021	\$9,000.00
11/19/2021	\$4,000.00

11/19/2021	\$1,000.00
11/19/2021	\$10,000.00
11/24/2021	\$20,000.00
12/1/2021	\$8,000.00
12/3/2021	\$30,000.00
12/6/2021	\$7,500.00
12/6/2021	\$10,000.00
12/10/2021	\$20,000.00
12/10/2021	\$46,160.91
12/22/2021	\$7,700.00
12/22/2021	\$44,946.46
12/30/2021	\$9,500.00
1/3/2022	\$3,000.00
1/6/2022	\$5,500.00
1/7/2022	\$34,493.37
1/7/2022	\$4,500.00
1/11/2022	\$8,500.00
1/13/2022	\$2,000.00
1/13/2022	\$1,500.00
1/18/2022	\$9,000.00
1/21/2022	\$33,468.19
1/24/2022	\$9,500.00
1/28/2022	\$8,800.00
2/2/2022	\$25,000.00
2/7/2022	\$8,000.00
2/8/2022	\$5,093.04
2/14/2022	\$9,000.00
2/17/2022	\$40,000.00
2/18/2022	\$42,721.68
2/22/2022	\$9,000.00
2/22/2022	\$5,000.00
2/28/2022	\$8,300.00
2/28/2022	\$20,000.00
3/7/2022	\$48,679.11
3/9/2022	\$2,400.00
3/10/2022	\$5,000.00
3/11/2022	\$7,100.00
3/11/2022	\$26,000.00
3/14/2022	\$23,000.00



3/14/2022	\$6,000.00
3/18/2022	\$30,000.00
3/18/2022	\$3,300.00
3/18/2022	\$4,700.00
3/21/2022	\$14,000.00
3/30/2022	\$6,000.00
3/31/2022	\$3,560.00
4/4/2022	\$7,000.00
4/4/2022	\$2,800.00
4/5/2022	\$6,500.00
4/7/2022	\$5,000.00
4/11/2022	\$3,000.00
4/11/2022	\$8,800.00
4/13/2022	\$20,000.00
4/15/2022	\$3,000.00
4/18/2022	\$15,000.00
4/18/2022	\$4,000.00
4/25/2022	\$5,000.00
4/25/2022	\$5,000.00
4/25/2022	\$5,000.00
4/28/2022	\$15,000.00
4/29/2022	\$4,300.00
5/2/2022	\$20,000.00
5/2/2022	\$2,536.00
5/2/2022	\$1,982.00
5/2/2022	\$6,000.00
5/9/2022	\$7,000.00
5/9/2022	\$2,000.00
5/16/2022	\$7,000.00
5/16/2022	\$7,500.00
5/16/2022	\$10,000.00
5/16/2022	\$4,000.00
5/18/2022	\$6,500.00
5/19/2022	\$4,000.00
5/23/2022	\$7,000.00
5/23/2022	\$7,200.00
5/31/2022	\$20,000.00
5/31/2022	\$5,000.00
5/31/2022	\$2,500.00

5/31/2022	\$1,800.00
6/2/2022	\$5,000.00
6/3/2022	\$4,000.00
6/6/2022	\$3,200.00
6/6/2022	\$10,000.00
6/6/2022	\$3,500.00
6/6/2022	\$5,000.00
6/8/2022	\$5,000.00
6/8/2022	\$2,500.00
6/13/2022	\$5,000.00
6/13/2022	\$20,000.00
6/13/2022	\$20,000.00
6/13/2022	\$11,000.00
6/13/2022	\$6,000.00
6/21/2022	\$12,000.00
6/22/2022	\$5,000.00
7/5/2022	\$15,000.00
7/5/2022	\$7,500.00
7/5/2022	\$10,000.00
7/5/2022	\$8,000.00
7/11/2022	\$1,900.00
7/11/2022	\$10,000.00
7/11/2022	\$20,000.00
7/11/2022	\$2,000.00
7/18/2022	\$20,000.00
7/18/2022	\$5,000.00
7/18/2022	\$3,500.00
7/18/2022	\$6,000.00
7/25/2022	\$23,000.00
7/25/2022	\$1,500.00
7/27/2022	\$5,000.00
7/27/2022	\$2,100.00
8/1/2022	\$7,500.00
8/1/2022	\$1,250.00
8/1/2022	\$1,000.00
8/1/2022	\$2,000.00
8/1/2022	\$8,000.00
8/1/2022	\$7,500.00
8/2/2022	\$4,700.00

8/2/2022	\$20,000.00
8/3/2022	\$3,500.00
8/3/2022	\$4,050.00
8/8/2022	\$25,000.00
8/11/2022	\$110.00
8/11/2022	\$4,500.00
8/11/2022	\$300.00
8/12/2022	\$4,000.00
8/12/2022	\$3,750.00
8/12/2022	\$7,400.00
8/15/2022	\$5,000.00
8/16/2022	\$6,000.00
8/16/2022	\$3,000.00
8/17/2022	\$5,000.00
8/18/2022	\$5,000.00
8/22/2022	\$10,300.00
8/22/2022	\$10,000.00
8/22/2022	\$200.00
8/24/2022	\$10,000.00
8/24/2022	\$3,000.00
8/24/2022	\$3,000.00
8/26/2022	\$5,000.00
8/29/2022	\$10,000.00
8/29/2022	\$8,000.00
9/2/2022	\$10,000.00
9/6/2022	\$1,800.00
9/6/2022	\$4,000.00
9/6/2022	\$3,000.00
9/6/2022	\$3,500.00
9/6/2022	\$8,500.00
9/7/2022	\$10,000.00
9/7/2022	\$7,000.00
9/12/2022	\$4,750.00
9/12/2022	\$11,600.00
9/12/2022	\$7,500.00
9/12/2022	\$10,000.00
9/19/2022	\$3,500.00
9/19/2022	\$25,000.00
9/19/2022	\$2,000.00

9/22/2022	\$4,500.00
9/22/2022	\$3,200.00
9/26/2022	\$2,000.00
9/26/2022	\$20,000.00
9/26/2022	\$5,000.00
9/27/2022	\$5,500.00
9/29/2022	\$9,000.00
9/29/2022	\$4,000.00
10/3/2022	\$11,000.00
10/3/2022	\$8,000.00
10/3/2022	\$8,000.00
10/3/2022	\$2,500.00
10/3/2022	\$550.00
10/3/2022	\$1,800.00
10/3/2022	\$4,400.00
10/4/2022	\$3,200.00
10/4/2022	\$6,000.00
10/6/2022	\$2,650.00
10/6/2022	\$6,000.00
10/7/2022	\$5,000.00
10/11/2022	\$4,000.00
10/11/2022	\$2,500.00
10/11/2022	\$500.00
10/11/2022	\$870.00
10/11/2022	\$2,300.00
10/11/2022	\$250.00
10/14/2022	\$2,600.00
10/17/2022	\$300.00
10/17/2022	\$13,000.00
10/17/2022	\$12,000.00
10/17/2022	\$900.00
10/17/2022	\$1,500.00
10/20/2022	\$25,000.00
10/20/2022	\$25,000.00
10/20/2022	\$5,000.00
10/20/2022	\$45,601.88
10/24/2022	\$15,000.00
10/24/2022	\$3,000.00
10/24/2022	\$9,000.00

10/24/2022	\$2,040.94
10/27/2022	\$10,000.00
10/31/2022	\$13,000.00
10/31/2022	\$13,000.00
10/31/2022	\$2,800.00
11/1/2022	\$4,000.00
11/3/2022	\$5,500.00
11/4/2022	\$4,500.00
11/7/2022	\$10,000.00
11/7/2022	\$6,500.00
11/7/2022	\$5,000.00
11/7/2022	\$1,600.00
11/14/2022	\$15,000.00
11/14/2022	\$1,200.00
12/12/2022	\$3,000.00
2/21/2023	\$4,500.00
2/21/2023	\$6,000.00
5/1/2023	\$2,731.00
5/12/2023	\$3,000.00
5/19/2023	\$6,300.00
5/30/2023	\$6,000.00
5/30/2023	\$16,000.00
8/1/2023	\$1,700.00
8/1/2023	\$700.00
8/3/2023	\$1,000.00
9/18/2023	\$11,012.00

**END OF REQUESTS**